

Before the
Federal Communications Commission
Washington, D.C.

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In the matter of:

1998 Biennial Review
Amendment of Part 97
of the Commission's
Amateur Service rules

WT Docket 98-143

RM-9148

RM-9150

RM-9196

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COMMENTS:

Amateur Radio Operations have fallen behind the technical advances developed by commercial interests in the past 30 years. With the deployment of several Satellite Communications systems, the commercial use of the H.F. spectrum has declined. Having a Amateur Radio License is no longer a attribute on a Job Application, and the general public still associates Amateur Radio with Citizen Band Radio.

The General thrust of the present Amateur License structure is to learn to send 20 WPM Code, and work the H.F. Bands. Tell this to a group of Internet literate High School Students and watch the looks on their faces. We have in place, a low cost, World wide communication system including video on the Internet. No License is required to use it, no antennas are needed, and the equipment is less expensive. With the current average age of a Amateur Radio Operator being over 50 Years old, Amateur Radio must adopt a new Mantra to survive the next Century.

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Amateur Radio has done a good job of providing Emergency Radio Services, but has failed to keep up with the state of the Radio Art, let alone contribute to it. Most Amateurs buy their Radio Equipment and use commercial services to maintain it. Most have little or no test equipment, including a growing number of Extra Class Operators.

I propose Three Classes of Amateur Radio License.

1. An Operator License. Tested on Rules and Regulations only, must have a Licensed Technician or higher Class licensed person to install or repair Station Equipment. This License will allow the holder to operate all Amateur Equipment on the Modes they hold an Endorsement for.
2. Technician License. In addition to the operator test, the Technician must pass a written test on D.C., A.C., Radio, Transmission Line, and antenna theory. A Technician Class can operate, install, and repair Amateur Radio Equipment for the modes they have Endorsements for. May experiment with antenna design but can not modify or construct on their own, any Transmit or Receive equipment for the Amateur Radio Bands.
3. Experimenters License. In addition to the Operator and Technician tests, the Experimenter must pass a written and practical Exam on modulation theory ,inter-modulation, repeater technical requirements, field strength measurements, construction techniques, and use of test

equipment including a spectrum analyzer. Applicants should be required to demonstrate some practical ability in the above areas and should be technically qualified to resolve interference complaints, install and maintain repeater equipment as well as build some of their own equipment, and determine that it is in compliance with Part 97 technical requirements. Those that do not have the practical skills but pass the technical exam could be designated "Experimenter in Training" and be allowed to learn under a Experimenter Licensee to gain the practical experience. An Experimenter License would allow for the construction and modification of equipment to be used on the Amateur Radio Bands and be the only License to be responsible for the operation of Repeaters.

Testing for the three Classes of license will qualify successful applicants for Phone Operation. In addition to the above testing the following Endorsements for operation of the following modes should be offered to all Class Licenses:

Satellite operations

Amateur Television

Digital Modes

Earth Moon Earth

C.W. 5, 20 WPM

The 20 WPM C.W. Endorsement would entitle the holder to work in the currently assigned Extra Class C.W. Bands. The current advanced Portion could be used for 5 WPM and the rest of the

C.W. portions for Digital Modes. 5 WPM would satisfy ITU Current requirements for H.F. Phone and Digital Modes below 30 MHz and if the ITU requirement is rescinded, C.W. proficiency for H.F. operation of non C.W. Modes should be dropped.

I believe my proposal will address the current inequities in the Amateur Radio Licensing system and encourage the acquiring of technical skills, rather than basic operating skills. Those Amateurs that lack the technical skills to build their own equipment should not receive the highest class of License in the Amateur Radio Service.

Respectfully submitted by:



ART MC BRIDE, KC6UQH

705 BOZANICH CIRCLE

VISTA, CA. 92084

760-758-6062

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